



IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION

MAGGIE RUSSELL

PLAINTIFF

VS.

CIVIL ACTION NO. 1:22-cv-00086-TBM-RPM

MISSISSIPPI GULF COAST COMMUNITY  
COLLEGE through its Board of Trustees  
(in their official and individual capacities) and  
DOES 1-20; inclusive

DEFENDANTS

**AFFIDAVIT OF DR. SUZANA BROWN**

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STATE OF MISSISSIPPI  
COUNTY OF Stone

THIS DAY personally appeared before me, Dr. Suzana Brown, who, after being duly sworn, deposes and states under oath, subject to the penalty of perjury, the following:

1. I obtained my Bachelor of Arts in Paralegal Studies from the University of Southern Mississippi in 1993 and my Master of Arts in English Literature from the University of Southern Mississippi in 1994. Further, I obtained my Ph.D. in Higher Education Administration from The University of Southern Mississippi in 2015. I have over 25 years in educational experience and instruction.
2. I am currently the Executive Vice President of Institutional Advancement of Mississippi Gulf Coast Community College (MGCCC), and I have been employed with MGCCC for the past twenty-one years. Prior to assuming my role as the Executive Vice President of Institutional Advancement in 2019, I served as MGCCC's Dean of Teaching and Learning at the Harrison County Campus from 2017-2018.
3. In the fall of 2017, I became acquainted with Maggie Russell and her mother, Susan Russell, when both Maggie and Susan visited my office to express that Maggie was having difficulties with Mr. Clay McClendon's Intermediate Algebra Course. I advised Maggie that, following the Intermediate Algebra course, she should enroll in "MAT 1314" (College Algebra), which is a four-hour course that involves time in the learning lab on campus. In the Summer of 2018, Maggie Russell chose to enroll in "MAT 1313" (College Algebra) taught by Sam Napier, which is a three-hour course that meets less frequently and moves at a faster pace than "MAT 1314."
4. On June 11, 2018, I received a letter from Susan Russell in which she complained about Mr. Napier. I asked Susan Russell why Maggie was enrolled in Mr. Napier's class, and she explained that Maggie decided to enroll in MAT 1313 instead of MAT 1314. After conferring with Dr. Phillip Bonfanti, MGCCC's Dean of Student

Services at the Harrison County Campus, I called Susan Russell and informed her that MGCCC could remove Maggie Russell from MAT 1313 and put her in MAT 1314. Susan Russell agreed.

5. On June 19, 2018, I received a formal packet from Susan Russell requesting that MGCCC formally waive and substitute College Algebra as a graduation requirement for Maggie. I shared this request with Dr. Johnathan Woodward and Dr. Jason Pugh. Shortly thereafter, I told Susan Russell that I would research her request and get back with her.
6. On July 10 and July 12, 2018, I called Susan Russell regarding her letter, and we met in my office on July 13, 2018. I informed her that we were able to do three things:
  1. Put Maggie in MAT 1314 in the Fall. This College Algebra format offers students more time in class and a lab component for students who struggle in math.
  2. Put Maggie in Mr. Chris Dedual's class (which is MAT 1314) since Maggie has worked with him previously and is comfortable with his teaching style.
  3. Provide Maggie with extra support in the learning lab, where MGCCC has qualified instructors/tutors.

Susan Russell also asked if MGCCC had any other math classes that it would substitute for College Algebra. Specifically, she asked about "Applied Business Math." I explained to her that this course was not part of MGCCC's core curriculum. However, after showing Susan Russell the curriculum, she did not think Maggie would be able to pass this course either.

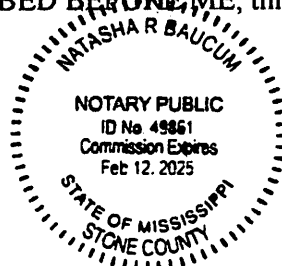
7. On July 31, 2018, I received a call from Aimee McGehee regarding Maggie's fall schedule. Mr. Dedual's class had been changed to another instructor. (The change was made so Mr. Dedual could teach an additional class without going over his points.) I called Ms. Clark, the department chair, to let her know that the class may have to be switched back to Mr. Dedual to accommodate Maggie Russell.

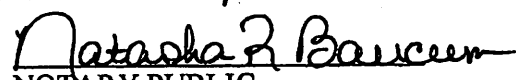
Further Affiant sayeth not,

This the 24th day of April, 2023.

  
DR. SUZANA BROWN

SWORN TO AND SUBSCRIBED BEFORE ME, this the 24<sup>th</sup> day of April, 2023



  
NOTARY PUBLIC